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M-11-888

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : TO BE FILED UNDER SEAL
- against - : COMPLAINT AND AFFIDAVIT
JESSE HIPPOLITE, also known as : IN SUPPORT OF APPLICATION
"Willie Sutton Jr.,," : FOR ARREST WARRANT
Defendant. : (T. 18, U.S.C. § 2113(a))
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IN THE APPLICATION OF THE UNITED :
STATES OF AMERICA TO SEARCH AND :
SEIZE A MOTOR VEHICLE DESCRIBED :
AS A 2004 NISSAN ALTIMA, BEARING :
NEW YORK LICENSE PLATE NUMBER :
FJK6518 AND VEHICLE :
IDENTIFICATION NUMBER :
1N4AL11D24C198190, REGISTERED TO :
JASON E. CHANDLER, 118-46 :
MARSDEN STREET, JAMAICA, NEW :
YORK 11434 :
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EASTERN DISTRICT OF NEW YORK, SS:

BRADFORD PRICE, being duly sworn, deposes and says that
he is a Special Agent with the Federal Bureau of Investigation
("FBI"), duly appointed according to law and acting as such.

Upon information and belief, in or about and between
December 22, 2010 and August 26, 2011, both dates being inclusive
and approximate, within the Eastern District of New York and
elsewhere, the defendant JESSE HIPPOLITE, also known as "Willie
Sutton Jr.,," together with others, did knowingly and
intentionally take by force, violence and intimidation, from the

person and presence of another, money belonging to and in the care, custody, control, management and possession of branches of banks, the deposits of which are insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Section 2113(a))

Also upon information and belief, there is probable cause to believe that, presently concealed within a motor vehicle described as a 2004 Nissan Altima, bearing New York licence plate number FJK6518 and Vehicle Identification Number 1N4ALL1D24C198190, registered to Jason E. Chandler at 118-46 Marsden Street, Jamaica, New York, 11434 (the "SUBJECT VEHICLE"), are certain property as set forth in Attachment A, and fingerprints, fibers and hairs, all of which constitute evidence, fruits and instrumentalities of violations of Title 18, United States Code, Section 2113(a).

The source of your deponent's information and the grounds for his belief are as follows:

1. I have been a special agent with the FBI for approximately seven years. I am one of the case agents on this case. As one of the case agents, I am fully familiar with the facts of the case. The facts set forth below are based on my personal observations, information from confidential sources, my discussions with other law enforcement officers and my review of documents and other evidence.

2. Because the purpose of this Affidavit is limited to setting forth probable cause to arrest the defendant and search the SUBJECT VEHICLE, I have not set forth every fact of which I am aware concerning this investigation. Except as explicitly set forth below, I have not distinguished herein between facts of which I have personal knowledge and facts of which I have hearsay knowledge. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

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I. IDENTIFICATION OF THE SUBJECT VEHICLE

3. On June 14, 2011, at approximately 3 p.m., a male suspect robbed the Chase Bank branch at 1640 86th Street in Brooklyn, New York. According to an eyewitness, the robber was a male, approximately 5'8" to 5'9" and 20 to 30 years old.

Surveillance video showed the robber wearing a tan jacket or sweatshirt, purple and white bandana, blue baseball cap and tan gloves. The robber used a handwritten demand note that had been written before entering the bank that stated, "GIVE ME ALL THE MONEY OR ELSE EVERYONE DIES!!!" The robber obtained approximately \$2,000 in United States currency and left the bank. A teller observed the robber exit the bank and enter the rear drivers' side door of a "mid-2000s" model white Nissan Altima. The teller also observed detailed features of the vehicle, including that the car had round rear lights, with an orange light above a red light on each side, and that the vehicle had a New York State licence plate that was yellow in color.

4. On July 1, 2011, at approximately 2:45 p.m., a male suspect robbed the Chase Bank branch at 210 Flushing Avenue in Brooklyn, New York. According to an eyewitness, the robber was male, approximately 5'10" to 6' tall and weighs approximately 180 pounds. Surveillance video showed the robber wearing a white T-shirt, hooded black jacket or sweatshirt, white gloves, dark bandana and dark baseball cap. The robber used a handwritten

demand note that had been written before entering the bank that stated, "GIVE ME ALL \$100 & \$50 BILLS OR ELSE EVERYBODY DIES!!!" The robber obtained approximately \$7,100 in United States currency and left the bank. A bank employee reported that the robber exited the bank and entered the drivers' side door of a white four-door Nissan Altima or Toyota Camry with New York license plate FJK6573.

5. Law enforcement officers with the New York Police Department conducted a search of its parking summons database for recent parking summons issued to cars bearing a license plate beginning with FJK----. Within the results of the search, officers identified only one car that fit the physical description of the car observed in the robberies: a white Nissan Altima bearing license plate number FJK6518.

6. Law enforcement officers with the New York Police Department then conducted a "lawman" search of all registered vehicles in the State of New York bearing a license plate with a number beginning FJK----. Within the results of the search, officers identified only one car that fit the physical description of the car observed in the robberies: a white Nissan Altima bearing license plate number FJK6518. This car has a vehicle identification number of 1N4AL11D24C198190 and is registered to Jason E. Chandler at 118-46 Marsden Street, Jamaica, New York, 11434 (the "SUBJECT VEHICLE").

II. IDENTIFICATION OF THE DEFENDANT

7. After identifying the owner of the SUBJECT VEHICLE as Jason Chandler, agents ran a criminal history check on Jason Chandler, which revealed that he was arrested in May 2010 for jumping a transportation turnstile. NYPD records indicate that he was with the defendant JESSE HIPPOLITE at the time, who was arrested on the same charge.

8. A criminal history check of the defendant JESSE HIPPOLITE indicates, among others, arrests in May 2010 for turnstile jumping and April 2011 for Assault with Intent to Cause Physical Injury.

III. THE DEFENDANT'S FACEBOOK PAGE

9. Based on my training and experience, I have learned the following about Facebook.

10. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

11. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or

herself, to particular Facebook users, to all Facebook users, or to anyone with access to the Internet, including people who are not Facebook users.

12. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet.

13. Facebook has a Photos application, where users can upload an unlimited number of albums and photos. Another feature of the Photos application is the ability to "tag" (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook's purposes, a user's "Photoprint" includes all photos uploaded by that user that have not been deleted, as well as all photos uploaded by any user that have that user tagged in them.

14. I queried the defendant JESSE HIPPOLITE's Facebook page, where he maintains a publicly viewable profile. I identified him to be the same Jesse Hippolite arrested with Jason Chandler by comparing photographs of him on Facebook with the photograph on his criminal history report. His Facebook page showed several relevant entries. For example, a status update from 1:57 p.m. on July 1, 2011 - approximately 47 minutes prior

to the July 1, 2011 robbery - stated "I Gotta Get That \$\$\$\$\$ Man!!!!" Other relevant entries are described later in this affidavit. All entries on JESSE HIPPOLITE's Facebook page that are described herein were viewable by any Facebook member in the general public at the time they were observed.

IV. THE GPS ON THE SUBJECT VEHICLE

15. Pursuant to a tracking warrant signed by United States Magistrate Judge Andrew L. Carter on July 19, 2011, a "slap-on" Global Positioning System Tracking Device ("GPS") was affixed to the SUBJECT VEHICLE on or about July 21, 2011.

16. Based on my training and experience, I am aware that the "slap on" GPS device gathers its latitude and longitude using Global Positioning System satellites. The device then transmits a message indicating its position via cellular communication systems. It is possible to track a functioning GPS device using either the GPS position indicated in the device's message or by tracking the cellular transmissions it sends. In addition, the GPS device also registers movement and transmits a message indicating that it is in motion ("motion signal") and, once it has been idle for five minutes, it transmits a message indicating that it is no longer in motion ("end motion signal"). The GPS motion detector is independent from the GPS location system.

17. The GPS appeared to be working properly until July 26, 2011 at 1:16 p.m., at which point the GPS began transmitting messages indicating it was continually at a location in Brooklyn (the "Brooklyn Location"). Agents subsequently visited the Brooklyn Location and did not find the GPS or the SUBJECT VEHICLE. By tracking the cellular signal transmitted by the GPS device, agents located the SUBJECT VEHICLE and determined that the GPS device was malfunctioning. On or about July 27, 2011, agents affixed a replacement GPS device to the SUBJECT VEHICLE.

18. On or about August 26, 2011, at approximately 5:50 p.m., a male suspect robbed the Chase Bank branch at 6510 Avenue U in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 6' tall. The robber used a handwritten demand note that stated, "GIVE ME ALL \$100'S & \$50'S IN BILL OR ELSE I WILL SHOOT EVERYONE DEAD!!!" The robber obtained approximately \$3,500 in United Stated currency and left the bank.

19. According to information transmitted by the GPS, the SUBJECT VEHICLE stopped at a location approximately twelve blocks from the Chase Bank branch at 6510 Avenue U in Brooklyn, New York at approximately 3:05 p.m. The SUBJECT VEHICLE departed the location at approximately 3:28 p.m. The SUBJECT VEHICLE later stopped at a location around the corner from the Chase Bank branch at 6510 Avenue U at approximately 5:12 p.m. The SUBJECT

VEHICLE departed the location at approximately 5:17 p.m. The SUBJECT VEHICLE stopped at or near the Chase Bank branch at 6510 Avenue U at approximately 5:26 p.m. At approximately 5:32 p.m. the SUBJECT VEHICLE moved from this location. The bank was robbed at approximately 5:50 p.m. and at approximately 6:00 p.m. the SUBJECT VEHICLE was monitored departing the area. The SUBJECT VEHICLE next stopped at or near the defendant's residence at approximately 6:27 p.m.

V. THE PATTERN OF BANK ROBBERIES

20. In addition to the June 14, July 1 and August 26, 2011 bank robberies described above, law enforcement officers with the New York Police Department identified sixteen other bank robberies and attempted bank robberies that followed a similar pattern.

21. On or about December 22, 2010, at approximately 3:57 p.m., a male suspect robbed the Chase Bank branch at 506 Kings Highway in Brooklyn, New York. According to an eyewitness, the robber was male, approximately 5'10" to 6' tall and weighed approximately 220 to 240 pounds. Surveillance video showed the robber wearing all black, including a black bandana or face covering. The robber used a handwritten demand note that stated, "GIVE ME THE MONEY BEFORE I SHOOT EVERYBODY!" The robber obtained approximately \$4,100 in United States currency and left the bank.

22. On or about December 30, 2010, at approximately 3:40 p.m., a male suspect robbed the Chase Bank branch at 1521 Kings Highway in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 6' to 6'1" tall, with a stocky build. Surveillance video showed the robber wearing all black, including a black bandana or face covering and black gloves. The robber used a handwritten demand note that stated, "GIVE ME ALL THE MONEY OR ELSE EVERYBODY DIES!!!" The robber obtained approximately \$15,432 in United States currency and left the bank.

23. On or about January 7, 2011, at approximately 4:43 p.m., a male suspect robbed the Chase Bank branch at 1240 Liberty Avenue in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 5'11" to 6' tall, with a medium build. Surveillance video showed the robber wearing all black, including a black bandana or facing covering, black hooded sweatshirt, black hat and black gloves. The robber used a handwritten demand note that stated, "GIVE ME ALL THE MONEY OR ELSE EVERYBODY DIES!!! \$100s \$50s \$20s ONLY." The robber obtained approximately \$4,412 in United States currency and left the bank.

24. On or about January 11, 2011, at approximately 2:44 p.m., a male suspect robbed the Chase Bank branch at 2100 Linden Blvd. in Brooklyn, New York. According to an eyewitness,

the robber was male and approximately 5'9" to 6'1" tall, with a medium build. Surveillance video showed the robber wearing a red and white striped sweatshirt. The robber used a handwritten demand note that stated, "GIVE ME ALL THE MONEY OR ELSE EVERYBODY DIES!!!" The robber obtained approximately \$1,499 in United States currency and left the bank.

25. On or about January 20, 2011, at approximately 4:25 p.m., a male suspect robbed the Apple Bank For Savings branch at 776 Manhattan Avenue in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 5'8" tall. Surveillance video showed the robber wearing all black. The robber used a handwritten demand note that stated, "GIVE ALL THE MONEY OR EVERYBODY'S DEAD!!!" The robber obtained approximately \$1,096 in United States currency and left the bank.

26. On or about January 22, 2011, at approximately 1:26 p.m., a male suspect robbed the Chase Bank branch at 2401 Ralph Avenue in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 5'10" to 6' tall. Surveillance video showed the robber wearing all black. The robber used a handwritten demand note that stated, "GIVE ME ALL THE MONEY OR ELSE EVERYBODY DIES!!! *\$100s \$50s \$20s etc." The robber obtained approximately \$3,800 in United States currency and left the bank.

27. One day later, on or about January 23, 2011, two photographs were uploaded to the defendant JESSE HIPPOLITE's Facebook page showing the defendant holding two bottles of what appears to be sparkling wine.

28. On or about January 25, 2011, at approximately 3:00 p.m., a male suspect attempted to rob the Chase Bank branch at 533 5th Avenue in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 6' tall, with a muscular build. Surveillance video showed the robber wearing a grey hooded sweatshirt and grey gloves. The robber used a handwritten demand note that stated, "GIVE ME ALL THE MONEY OR ELSE EVERYBODY DIES! *\$100s \$50s \$20s etc." The robber did not obtain any money on this attempt.

29. On or about January 29, 2011, at approximately 2:50 p.m., a male suspect attempted to rob the Chase Bank branch at 127 7th Avenue in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 5'10" tall. Surveillance video showed the robber wearing a grey hooded sweatshirt and black gloves. The robber used a handwritten demand note that stated, "GIVE ME ALL THE MONEY OR EVERYBODY DIES!!! *\$100s \$50s \$20s." The robber did not obtain any money on this attempt.

30. On or about February 7, 2011, at approximately 10:45 a.m., a male suspect attempted to rob the Chase Bank branch

at 6501 18th Avenue in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 6' tall, with a medium build. Surveillance video showed the robber wearing a green hooded sweatshirt, tan gloves and a black bandana or face covering. The robber used a handwritten demand note that stated, "GIVE ME ALL THE MONEY BEFORE I START SHOOTING EVERYBODY! *\$100s \$50s \$20s." The robber did not obtain any money on this attempt.

31. On or about February 7, 2011, at approximately 12:15 p.m., a male suspect attempted to rob the Citibank branch at 133-07 Rockaway Blvd. in South Ozone Park, New York. According to an eyewitness, the robber was male and approximately 6' tall. Surveillance video showed the robber wearing a grey hooded, zippered sweatshirt with white, wide, flat hood ties and a small emblem. The robber used a handwritten demand note that stated, "GIVE ME ALL THE MONEY OR ELSE EVERYONE DIES!! 100 50's 20's ETC." The robber did not obtain any money on this attempt.

32. Three images uploaded to the defendant JESSE HIPPOLITE'S Facebook page on January 4, 2011 show the defendant in what appears to be the same grey hooded, zippered sweatshirt with white, wide, flat hood ties and a small emblem.

33. On or about June 17, 2011, at approximately 4:25 p.m., a male suspect robbed the Capital One branch at 2102 Ralph Avenue in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 5'8" to 5'9" tall. An

eyewitness also reported that the robber used a demand note, but retrieved it before leaving the bank. The witness recalled that the demand note used by the robber stated in sum and substance, "GIVE ME THE MONEY OR EVERYONE DIES." Surveillance video showed the robber wearing a green hooded jacket and a white baseball cap with black or blue brim. The robber obtained approximately \$1,402 in United States currency and left the bank.

34. On or about June 22, 2011, at approximately 5:25 p.m., a male suspect robbed the Capital One branch at 2123 Avenue U in Brooklyn, New York. According to an eyewitness, the robber was male, approximately 5'11" to 6'2" tall, and weighed approximately 180 pounds. Surveillance video showed the robber wearing a grey hooded sweatshirt and a red bandana. The robber used a handwritten demand note that stated, "GIVE ME ALL THE MONEY OR ELSE EVERYONE WILL DIES!!!!" The robber obtained approximately \$2,197 in United States currency and left the bank.

35. On or about June 23, 2011, at approximately 4:10 p.m., a male suspect robbed the Chase Bank branch at 159 5th Avenue in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 5'11" to 6'2" tall. Surveillance video showed the robber wearing a grey hooded sweatshirt. The robber used a handwritten demand note that stated, "GIVE ME ALL \$100 & \$50 BILLS OR ELSE EVERYONE DIES!!!"

The robber obtained approximately \$4,900 in United States currency and left the bank.

36. On or about July 11, 2011, two photographs were uploaded to the defendant JESSE HIPPOLITE's Facebook page showing the defendant holding approximately nine \$100 bills.

37. On or about July 26, 2011, at approximately 3:47 p.m., a male suspect robbed the Chase Bank branch at 231-01 Merrick Blvd. in Laurelton, New York, which is in Queens. According to an eyewitness, the robber was male and approximately 6' tall, with a medium build. Surveillance video showed the robber wearing a black jacket with a large, white, square emblem on the left breast, a purple and white bandana, a purple baseball cap, dark sunglasses and gloves. The robber used a handwritten demand note that stated, "GIVE ME \$100'S & \$50'S BILLS OR ELSE EVERYONE WILL DIE!!!!" The robber obtained approximately \$600 in United Stated currency and left the bank.

38. On or about July 29, 2011, a status update to the defendant JESSE HIPPOLITE's Facebook page stated, "What If We All GOT Fed Up With This RecessiOn And Started Running Inside Every Fucking Bank TO Give Us The M0ney That Bel0ng TO Us??? Niggas Ain't Willing TO Go That Far And That's Why The GOvernment Ain't Never G0nna Respect the Pe0ple Because We All Ain't Wildin 4 Respect!!!!" On or about the same day, the defendant JESSE

HIPPOLITE changed his Facebook profile name to "Willie Sutton Jr." I am aware that Willie Sutton was a prolific bank robber.

39. On or about August 15, 2011, at approximately 3:39 p.m., a male suspect attempted to rob the Chase Bank branch at 2909 W. 17th Street in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 6' tall. Surveillance video showed the robber wearing a blue hooded sweatshirt with a large "Champion" logo on the left breast, NY Yankees baseball cap, sunglasses, white bandana with blue detail and white gloves. The robber used a handwritten demand note that stated, "GIVE ME ALL \$100S & \$50S OR ELSE EVERYBODY DIES!!!" The robber did not obtain any money on this attempt.

40. On or about August 16, 2011, at approximately 1:56 p.m., a male suspect robbed the Capital One branch at 2123 Avenue U in Brooklyn, New York. According to an eyewitness, the robber was male and approximately 6' tall. An eyewitness also reported that the robber used a demand note, but retrieved it before leaving the bank. The witness recalled that the demand note used by the robber stated in sum and substance, "GIVE ME ALL YOUR MONEY OR EVERYONE DIES." Surveillance video showed the robber wearing a dark sweatshirt, maroon baseball cap with a large "NY" logo, black sunglasses and dark pink or red bandana with white detail. The robber obtained approximately \$1,850 in United States currency and left the bank.

41. In all nineteen robberies and attempted robberies described herein, the robber entered the bank with a handwritten demand note that had been written before entering the bank. The demand notes from seventeen of the robberies were recovered. The New York Police Department Criminalistics Section compared the handwriting on the demand notes to known writing samples by the defendant JESSE HIPPOLITE that were obtained from the New York State Department of Correctional Services, in whose custody the defendant JESSE HIPPOLITE was held as a result of a prior criminal conviction. It was determined that it is highly probable that all seventeen demand notes were written by the author of the known writing samples by the defendant JESSE HIPPOLITE.

VI. THE DEFENDANT

42. Based on the criminal history report of the defendant JESSE HIPPOLITE, the defendant is a black male, who is 5'9" tall and weighs 215 pounds. Review of photographs on the defendant's Facebook page and surveillance have confirmed this description.

VII. THE SUBJECT VEHICLE

43. As indicated above, the SUBJECT VEHICLE is a 2004 Nissan Altima, bearing New York licence plate number FJK6518 and Vehicle Identification Number 1N4AL11D24C198190, registered to

Jason E. Chandler at 118-46 Marsden Street, Jamaica, New York, 11434.

44. The GPS on the SUBJECT VEHICLE continues to be monitored. Recent transmissions indicate that the SUBJECT VEHICLE returns almost every day, if not every day, to Jason E. Chandler's residence at 118-46 Marsden Street, Jamaica, New York, 11434 and has been monitored at that location. As of 2:00 p.m. today, the SUBJECT VEHICLE was parked at Jason E. Chandler's residence.

45. Based on the information set forth in this Affidavit, there is probable cause to believe that there are evidence, fruits and instrumentalities of violations of Title 18, United States Code, Section 2113(a) as set forth in Attachment A located within the SUBJECT VEHICLE.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued under seal for defendant JESSE HIPPOLITE, also known as "Willie Sutton Jr.," so that he may be dealt with according to law.

WHEREFORE, your deponent respectfully requests that a warrant be issued under seal authorizing Special Agents of the Federal Bureau of Investigation, with such other assistance as may be necessary, to seize the SUBJECT VEHICLE and search it for certain property as set forth in Attachment A, and fingerprints, fibers and hairs, all of which constitute evidence, fruits and

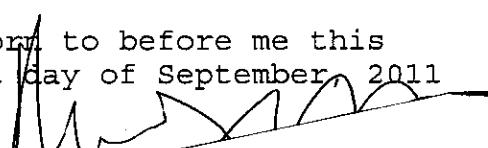
instrumentalities of violations of Title 18, United States Code, Section 2113(a). Your deponent further requests that the warrant authorize the opening of any locked or unlocked door, compartment or other object on or within the vehicle.

Because this investigation is ongoing, and in light of the nature of this Affidavit, it is further respectfully requested that this Affidavit and Application and any Order issued thereon be ordered sealed until further notice.



BRADFORD PRICE
Special Agent
Federal Bureau of Investigation

Sworn to before me this
1st day of September 2011



THE HONORABLE
UNITED STATES
EASTERN DISTRICT

S/60

ATTACHMENT A

Evidence to be seized, all of which constitute evidence, fruits and instrumentalities of violations of Title 18, United States Code, Section 2113(a):

- (A) Financial documents dated on or after December 22, 2010, including, but not limited to, money orders, checks, bank statements, credit card account records, deposit receipts and currency transactions records;
- (B) Records, books, logs, ledgers, lists, and any other documents revealing information relating directly or indirectly to stolen funds;
- (C) United States currency;
- (D) Papers or documents that appear to bear the defendant's handwriting;
- (E) Any weapons; and
- (F) Clothing and apparel resembling that which was worn by the suspect observed by eyewitnesses and on video surveillance in the commission of the robberies, to wit:
 - (i) tan jacket or sweatshirt;
 - (ii) hooded black jacket or sweatshirt;
 - (iii) black jacket or sweatshirt;
 - (iv) red and white striped sweatshirt;
 - (v) grey hooded sweatshirt;
 - (vi) green hooded jacket or sweatshirt;
 - (vii) grey hooded, zippered sweatshirt with white, wide flat hood ties and a small emblem;
 - (viii) blue hooded sweatshirt with large "Champion" logo on left breast;
 - (ix) black jacket with large, white, square emblem on left breast;
 - (x) purple and white bandana;
 - (xi) dark bandana;
 - (xii) black bandana;
 - (xiii) red bandana;
 - (xiv) white bandana with blue detail;
 - (xv) dark pink or red bandana with white detail;
 - (xvi) blue baseball cap;
 - (xvii) dark baseball cap;
 - (xviii) white baseball cap with black or blue brim;
 - (xix) purple baseball cap;
 - (xx) NY Yankees baseball cap;
 - (xxi) maroon baseball cap with large "NY" logo;
 - (xxii) black hat;
 - (xxiii) tan gloves;
 - (xxiv) white gloves;
 - (xxv) grey gloves;
 - (xxvi) black gloves;
 - (xxvii) white T-shirt;
 - (xxviii) black pants;
 - (xxix) black shirts;
 - (xxx) dark sunglasses; and
 - (xxxi) black sunglasses.